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Attorneys for Defendant
G & B GROCERS dba RANCHO CORDOVA
GROCERY OUTLET [*erroneously sued as G & B GROCERS*
doing business as Grocery Outlet]

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

MAURSHAE SMITH, on behalf of herself and
all others similarly situated,

Plaintiff,

v.

G & B GROCERS, a California corporation,
doing business as Grocery Outlet, and DOES 1-
10,

Defendants.

Case No: 2:21-cv-01504-MCE-AC

**JOINT STIPULATION TO CONTINUE
DEADLINES IN INITIAL PRETRIAL
SCHEDULING ORDER; ORDER**

Complaint Filed: August 22, 2021
Trial Date: None Set

1 IT IS HEREBY STIPULATED AND AGREED, between Plaintiff MAURSHAE SMITH's
2 ("Plaintiff"), G & B GROCERS dba RANCHO CORDOVA GROCERY OUTLET [*erroneously sued*
3 *as G & B GROCERS doing business as Grocery Outlet*] ("Defendant"), through their respective counsel
4 of record, as follows:

5 WHEREAS, on August 23, 2021, the Court entered an Initial Scheduling Order (ECF No. 4);

6 WHEREAS, on September 20, 2022, the Parties submitted a Joint Stipulation to Continue
7 Deadlines in Initial Pretrial Scheduling Order (ECF No. 10);

8 WHEREAS, on September 27, 2022, the Court entered its Order on Joint Stipulation to Continue
9 Deadlines in Initial Pretrial Scheduling Order (ECF No. 11);

10 WHEREAS, this Joint Stipulation is not entered into with the intent to delay;

11 WHEREAS, by continuing the discovery and other deadlines set forth herein, there is no
12 prejudice to any party;

13 WHEREAS, the parties desire to avoid unnecessary costs associated with these deadlines before
14 completing essential non-expert, and fact discovery while the Parties continue to discuss potential
15 resolution, as incurring said costs on both sides may be an impediment to resolving this case;

16 WHEREAS, good cause exists for granting the Parties' request to extend the following deadlines
17 by thirty (30) days in accordance with Federal Rules of Civil Procedure Rule 29;

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NOW THEREFORE, the Parties respectfully request that the Court modify its Order on Joint Stipulation to Continue Deadlines in Initial Pretrial Scheduling Order, ECF No. 11, and continue the following deadlines:

Event	Existing Deadline	Requested Deadline
Deadline to complete all non-expert discovery	November 21, 2022	December 21, 2022
Deadline to complete fact discovery	December 20, 2022	January 20, 2023
Deadline to file dispositive motions	January 20, 2023	February 20, 2023
Deadline to exchange expert disclosures	February 21, 2023	March 23, 2023
Deadline to serve supplemental list of expert disclosures	March 20, 2023	April 19, 2023

IT IS SO STIPULATED.

DATE: November __, 2022

NUNES WORKER RIGHTS LAW, APC

By: _____

Anthony J. Nunes

Attorneys for Plaintiff
MAURSHAE SMITH

Dated: November __, 2022

FISHER & PHILLIPS LLP

By: _____

Alden J. Parker
Christopher S. Alvarez

Attorneys for Defendant
G & B GROCERS dba RANCHO CORDOVA
GROCERY OUTLET [*erroneously sued as*
G & B GROCERS doing business as
Grocery Outlet]

ORDER

Having read and considered the Parties' Joint Stipulation, for good cause appearing, IT IS
HEREBY ORDERED as follows:

1. Deadline to complete all non-expert discovery: December 21, 2022;
2. Deadline to complete fact discovery: January 20, 2023;
3. Deadline to file dispositive motions: February 20, 2023;
4. Deadline to exchange expert disclosures: March 23, 2023; and
5. Deadline to serve supplemental list of expert disclosures: April 19, 2023.

IT IS SO ORDERED.

Dated: November 20, 2022



MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE